



**Quality Certification Services (QCS)**

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*QCS is the Certification Program of Florida Certified Organic Growers and Consumers, Inc. (FOG)*

April 6, 2006

Subject: QCS Comments on the AWG Interim Final Report

Dear USDA:

Quality Certification Services is a USDA National Organic Program (NOP) accredited certifier who also currently certifies organic aquaculture operations to a private standard based upon the NOP livestock standard. QCS has followed the discussion of NOP standards for aquaculture products since the implementation of the OFPA in 2002. During that time the amount of consumer and producer interest in such standards has continually increased. Accordingly, QCS appreciates the significant progress that the Interim Final Report represents and is grateful for the hard work and deep thought that all of the participants have put into this initiative.

QCS supports generally the standards as proposed in the Interim Final Report and submits the following comments about specific provisions:

Section 205.251(a) Origin of Aquaculture Animals

QCS does not support the provision allowing organic management to commence when 5% of market weight has been achieved, when such market weight is achieved in a substantially greater time than the second day after the beginning of exogenous feeding. In some cases, the amount of time to reach 5% of total market weight may substantially exceed the two-day threshold and may come to represent too great a fraction of the total life under culture. Obviously, the analysis depends on the specifics of the species in question. In many cases it may be applicable without problem, but not in all cases. QCS believes this provision should be carefully reconsidered and made more applicable to the specifics of each species.

Section 205.252 (g)-Wild Sources of Fish and Fish Meal

QCS supports Option B, but would support option A if it was limited to by-catch from existing commercial fishing (i.e. the inadvertent catch of non-target species which is customarily returned dead or injured to the sea) and renderings as specified in Section 205.252(g)(2) of Option A.

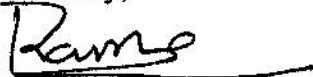
QCS does not support 205.252(g)(1) of Option A as proposed because the mechanisms for ensuring sustainability of fisheries ( certification by internationally recognized fisheries certification programs) assumes that there are uniform standards which are both effective and have been developed with the appropriate input of all relevant stakeholders; QCS is not assured that this is always true. Additionally, unless explicitly addressed, there is the potential that stocks which are not currently fished commercially for human consumption will be targeted specifically

for use in the organic fish meal market. In such a case the unintended consequence of this provision would be to increase the exploitation of wild fisheries.

Section 205.252(n)(3)-Mammalian and Poultry Slaughter By-Products

After considering the discussion of this subject in the Interim Final Report, QCS concludes that it cannot agree to categorically prohibit the use of slaughter by products in all cases. If the only realistic alternative to allowing such by-products is allowing synthetic amino acids, QCS believes that the recycling of slaughter by-products represent a more sustainable practice. However, should by-products of slaughter be allowed, they should be limited to the feed rations of species which are carnivorous in their natural state (or omnivorous if animal life is a substantial part of their natural diet.)

Sincerely,

A handwritten signature in black ink, appearing to read "Ramkrishnan", with a horizontal line extending from the end of the signature.

Ramkrishnan  
Certification Program Director  
Quality Certification Services (QCS)